

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

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U.S. DIST. COURT
WEST. DIST. OF MO.
KANSAS CITY, MO.

Willie C Fortune Jr

Complaint for a Civil Case

Case No. 4:21-cv-00810-GAF
(to be filled in by the Clerk's Office)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-
CASS County
RAYMORE Police Department
Officer Maurice Lane

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

REQUEST FOR TRIAL BY JURY

Plaintiff requests trial by jury. ☒ Yes ☐ No

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Willie C Fortune Jr
Street Address 2336 Quincy
City and County KANSAS City MO 64127 Jackson
State and Zip Code Missouri 64127
Telephone Number 816) 305-1075
E-mail Address CharlesFortune1978@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name Police Department of RAYMORE
Job or Title RAYMORE Police Department
(if known)
Street Address 100 Municipal Cir
City and County RAYMORE CASS County
State and Zip Code Missouri 64083
Telephone Number 816) 331-0530
E-mail Address _____
(if known)

Defendant No. 2

Name _____
Job or Title _____
(if known)
Street Address _____
City and County _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____
(if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the designated information for this type of case. *(Check all that apply)*

☒ Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

The Fourth Amendment to the U.S. Constitution - 42 U.S.C. §
1983 - Civil Rights Act of the 1871

☒ Suit against the Federal Government, a federal official, or a federal agency

List the federal officials or federal agencies involved, if any.

☐ Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

A. The Plaintiff(s)

The plaintiff, *(name)* _____, is a citizen of the State
of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) Maurice Lang, is a citizen of the State of (name) Missouri. Or is a citizen of (foreign nation) _____.

2. If the defendant is a corporation

The defendant, (name) Raymore Police Department, is incorporated under the laws of the State of (name) Missouri, and has its principal place of business in the State of (name) Raymore Missouri. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake----is more than \$75,000, not counting interest and costs of court, because (explain):

The Plaintiff is suffering a dislocated and deformed bone in his right hand thumb (primary/dominant) hand. As well as due to the unnecessary use of excessive force, assault and battery for unnecessary reasons of abuse/harassment with practicing tactics.

III. Statement of Claim

Write a short and plain statement of FACTS that support your claim. Do not make legal arguments. You must include the following information:

- What happened to you? I was attacked by Raymore police officer(s) at the present of being grabbed and put in a restraint hold and constantly using excessive force to my thumb and right hand in arms, constantly assaulting me, while I'm screaming you are hurting me.
- What injuries did you suffer? main dominant hand
- My right hand thumb bone is deformed and dysfunctional to use
- Who was involved in what happened to you?

#937 Maurice Lang (officer) - #912 Allen Devor (officer)
Domestic Violence (8/11/21)

- How were the defendants involved in what happened to you? *Officer Lang begin attacking me and grabbing my Right Hand, twisting and bending my Right Hand and thumb as following to left arm officer DOR*
- Where did the events you have described take place?
Raymore Missouri Resident (Female girlfriend House)
- When did the events you have described take place?
04/03/21

If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

I Would like for the Raymore Police Department to be responsible for the injuries that was caused to the (my) Right Hand Thumb Carpalage/Bone Due to the Excessive of unnecessary force used and assault. With Compensation of \$75,000 of Pain and Suffering.

Do you claim the wrongs alleged in your complaint are continuing to occur at the present time?

Yes ☐

No ☐

Do you claim actual damages for the acts alleged in your complaint?

Yes ☒

No ☐

Do you claim punitive monetary damages?

Yes ☒

No ☐

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

\$75,000 dollars Due to the Abuse of pain and suffering, that
is causing me not to be able to use my dominant hand (Right) damage and
deform usage - stop me from working correctly with equipment, exercising, writing correctly.
Constant and Randomly Shooting Pain through my Right Hand thumb injury.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Sep. 9, 2021.

Signature of Plaintiff

Willie Fortune

Printed Name of Plaintiff

Willie C Fortune